

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-28 THROUGH 32**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated August 8, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DAVID POPKIN**

DBP/USPS-28 Assume the scenario where Post Office A is discontinued or consolidated and its delivery functions [post office box and carrier delivery, if any] are transferred to Post Office B such that the customer will utilize a post office box physically located at Post Office B or be served by a delivery carrier on a route now originating at Post Office B. Further assume that the customer's original address had a last line of "Town A, NJ 07688".

- [a] Please advise whether it will be possible for the customer to maintain their same address that they had before the discontinuance or consolidation of Post Office A, namely a last line of "Town A NJ 07688" and also maintain the rest of the address the same. The processing plant will be programmed to send mail addressed to Town A NJ 07688 physically to Post Office B [ZIP Code 07633] where employees of Post Office B will place this mail in the box section for the transferred customers as well as having the carriers deliver the mail on routes originating at Post Office B.
- [b] If so, will the Postal Service utilize this procedure of making the change transparent to the customers of Post Office A?
- [c] If not, why not?

RESPONSE

- (a) It will be possible in this hypothetical if the Postal Service adopts policies and procedures to make it possible in that circumstance.
- (b) In the hypothetical you pose, that will be a possibility.
- (c) N/A

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DBP/USPS-29 Please refer to your attached chart in response to Interrogatories DBP/USPS-6 through 8.

- [a] Please confirm, or explain if you are unable to confirm, that the BRICK & MORTAR / RETAIL COUNTER column applies to all independent post offices and classified stations/branches and only to this type of facility.
- [b] Please advise the types of facilities that are included in the BRICK & MORTAR / CONTRACT POSTAL CENTER column.
- [c] If all of the Alternate Access Sites are not included in the Contract Postal Center column, please provide the similar data for each of the types of Alternate Access Sites.

RESPONSE

- (a) That is the intent.
- (b) Contract Postal Units.
- (c) Approved Shippers accept mail and sell postage and packaging.
Consignment operations sell postage stamps.

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DBP/USPS-30 Please refer to your attached chart in response to Interrogatory DBP/USPS-13.

- [a] Please explain why mailers who utilize a Permit Imprint and/or Precancelled Stamps are not counted in the revenue figure while mailers who make a similar mailing and pay the postage with a postage meter are counted.
- [b] Please explain why mailers who pay for Express Mail with a corporate account are not counted in the revenue figure while mailers who make a similar mailing and pay the postage with a postage meter or over the retail counter are counted.
- [c] Please explain why mailers who pay for their Post Office Box rent at an APC or at usps.com are not counted in the revenue figure while mailers who pay their rent over the retail counter are counted.
- [d] Please explain why mailers who pay for their mailing at an APC are not counted in the revenue figure while mailers who pay for the same mailing over the retail counter are counted.

RESPONSE

- (a) Permit imprint and precancelled (P&P) stamp mailings are bulk entry transactions for which there is relatively little acceptance workload in relation to the high dollar value of the bulk mailing. Counting this mail as walk-in retail would skew the assessment of walk-in revenue per hour. Metered mail can be entered in bulk or at retail. As a matter of convention, for purposes of earned workload, metered mail is counted as walk-in revenue, despite the fact that some metered mailings may, to some degree, be "similar" to permit imprint and precancelled stamp mailings. Otherwise, making a change to count P&P transactions as retail or all metered mail as commercial would skew comparisons to historical data, productivity and revenue trends.

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RESPONSE to DBP/USPS-28 (continued)

- (b) The same general considerations as discussed in response to subpart (a) come into play. Also, commercial postage revenue is often paid at a facility different from the one at which the mail is accepted and where work is performed.
- (c) The objective is to measure walk-in retail workload via transactions that require interaction with or activity by retail window personnel who perform work associated with the mail or service in question. Transactions conducted via an APC do not fall within that category.
- (d) See the response to subpart (c).

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DBP/USPS-31 Please refer to your response to Interrogatory DBP/USPS-15. Please provide the specific section of USPS Handbook PO-101 that specifies the number of Alternate Access Sites that are to be considered in the determination of including a facility for evaluation.

RESPONSE

Please review the following quotations from the response to DBP/USPS-15:

First:

[T]he existence of five alternate access locations (including postal retail sites) within a specified proximity of a postal retail location subject to discontinuance review is only a factor in determining whether it is a candidate for discontinuance review as part of the RAO Initiative.

Then:

There is no specific number of nearby alternate access sites that serves as a controlling factor in the USPS Handbook PO-101 process used to determine whether to discontinue operation of a retail facility.

That response does not imply that the PO-101 was a source of the determination to specify what number of alternate access sites needed to be within a specified proximity to a retail location for it to be a candidate for discontinuance under the RAO Initiative.

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DBP/USPS-32 Please refer to your attached chart in response to Interrogatory DBP/USPS-16.

- [a] Please advise the national policy as to whether a specific facility should or should not provide retail window service on Saturdays.
- [b] Evaluation of the chart shows a variation of Saturday retail window service ranging between 23-percent and 99-percent. Please explain why there is such a wide disparity between the different districts.

RESPONSE

- (a) Retail window service is provided on Saturdays if there is a demonstrated need. At financial units serving business areas or facilities serving communities where residents leave on weekends, retail service may be closed if service is available at other postal units, at contract stations, or by self-service equipment.
- (b) Variation is to be expected when local management has the discretion described in response to subpart (a) to make assessments based on local circumstances.